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May 20, 2015

David Butler
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: Amended August Monthly Report (7/01/14 - 7/31/14), received 1/30/15
Amended September Monthly Report (8/01/14 - 8/31/14), received 1/30/15
Amended October Monthly Report (9/1/14-9/30/14), received 1/30/15
Amended 12 Day Pre-General Report (10/1/15-10/15/14), received 1/30/15
Amended 12 Day Pre-Run-Off Report (10/16/14-11/16/14), received 1/30/15

Dear Mr. Butler:

Women Speak Out PAC (WSO PAC) has received Requests for Additional Information (RFAs) regarding our Amended August Monthly Report, Amended September Monthly Report, Amended October Monthly Report, Amended 12 Day Pre-Runoff Report, and Amended 12 Day Pre-General Report.

WSO PAC timely amended these reports and, per your advice, is also providing the below clarification regarding the items addressed in the RFAs.

First, one item was common throughout all reports (i.e., item 4 (Amended Aug. Monthly); item 2 (Amended Sept. Monthly); item 5 (Amended Oct. Monthly); item 3 (Amended 12 Day Pre-General); and item 5 (Amended 12 Day Pre-Run-Off)).

Regarding

the 48-hour reporting requirements referenced in these items, when WSO PAC became aware that a small segment of its door-to-door canvassers were failing to timely submit reports of their hours and mileage for reimbursement, WSO PAC immediately contacted you regarding this issue. You advised us that the best way to remedy this issue from a reporting standpoint was for WSO PAC to simply include the canvassers' reimbursement expenses on its next 48-hour report, rather than amending all previous 48-hour reports that may have been affected. Relying upon this advice, WSO PAC proceeded to report the canvassing-related expenses and also immediately reminded all of its canvassers the importance, going forward, of timely submitting their expenses for reimbursement to ensure that WSO PAC remains in compliance with all applicable FEC reporting requirements.

The remaining items are addressed below.

Amended August Monthly Report

Item 1. Regarding the reimbursements to individuals for "Travel Expenses" disclosed on Schedule B, there were no instances in which itemization was necessary for a particular reimbursement to individual staff in excess of \$500, because related payments to any one vendor did not aggregate in excess of \$200 for the calendar year.

Item 2. WSO PAC has identified the affected transactions on Schedule B supporting Line 21(b) of the report and modified the description for "consulting" in its amended report filed on May 14, 2015.

Item 3. Our understanding is that the Commission is inquiring as to why Schedule E of WSO PAC's Amended August Monthly

Report did not reflect certain itemized independent expenditures that were previously reported on its 48-hour reports during the reporting period. First, regarding the Lukens Company transactions, 48-hour reports were timely filed on May 30, 2014, and were also itemized on WSO PAC's June monthly report. Unfortunately, these same Lukens Company transactions were inadvertently reported for a second time via 48-hour reports filed on July 3, 2014 (i.e, during the August monthly

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reporting period). Because the Lukens Company transactions were mistakenly reported twice and also related back to a previous monthly reporting period, they were not itemized on Schedule E of the August monthly report. Additionally, transactions appearing on WSO PAC's 48-hour reports filed during the August reporting period and which reference disbursements to Timothy Hathaway were merely internal system test transactions, and were inadvertently reported as actual disbursements by WSO PAC to Mr. Hathaway. The internal system test transactions during the August reporting period should not have been included on any FEC report (48-hour or otherwise) and should be disregarded. Finally, certain other independent expenditures required slight modifications from what was initially reported on 48-hour reports and what was later reported on the August monthly report, and it is our understanding that this is what lead to some confusion regarding Schedule E itemizations on the August report. In the amended report filed on May 14, 2015, these modifications have now been identified in the memo text of the individual transaction with a reference made to what was originally reported.

Amended September Monthly Report

Item 1. Our understanding is that the Commission is inquiring as to why Schedule E of WSO PAC's Amended September Monthly Report did not reflect certain itemized independent expenditures that were previously reported on its 48-hour reports during the reporting period. Some transactions appearing on WSO PAC's 48-hour reports filed during the September reporting period and which reference disbursements to Timothy Hathaway were merely internal system test transactions, and were inadvertently reported as actual disbursements by WSO PAC to Mr. Hathaway. The internal system test transactions during the August reporting period should not have been included on any FEC report (48-hour or otherwise) and should be disregarded. Certain other independent expenditures required slight modifications from what was initially reported on 48-hour reports and what was later reported on the September monthly report, and it is our understanding that this is what lead to some confusion regarding Schedule E itemizations on the September report. In the amended report filed on May 14, 2015, these modifications have now been in the memo text of the individual transaction with a reference made to what was originally reported.

Amended October Monthly Report

Items 1 and 2. WSO PAC has identified the affected transactions on Schedule B supporting Line 21(b) of the report and modified the description for "consulting" or "stipend" in its amended report filed on May 18.

Item 3. Regarding the reimbursements to individuals for "Travel Expenses" disclosed on Schedule B of the Amended October Monthly Report, the Committee has itemized where necessary reimbursements to individual staff in excess of \$500, if related payments to any one vendor aggregated in excess of \$200 for the calendar year.

Item 4. Our understanding is that the Commission is inquiring as to why Schedule E of WSO PAC's Amended October Monthly

Report did not reflect certain itemized independent expenditures that were previously reported on its 48-hour reports during the reporting period. First, the majority of the transactions identified on the five pages that were attached to the RFAI do correctly appear as itemized transactions on Schedule E of the Amended October Monthly Report, and after discussing this issue with you, our understanding is that no further action is needed. Second, certain other independent expenditures required slight modifications from what was initially reported on 48-hour reports and what was later reported on the October monthly report, and it is our understanding that this is what lead to some confusion regarding Schedule E itemizations on the October report. In the amended report filed on May 18, 2015, these modifications have

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now

been identified in the memo text of the individual transaction with a reference made to what was originally reported.

Amended 12 Day Pre-General Report (10/1/15-10/15/14), received 1/30/15

Item 1. The intended recipient of the referenced WSO PAC contribution was the Homeschool Legal Defense Fund, rather than

Homeschool Legal Defense Association PAC. WSO PAC received a refund for the initial contribution in January 2015, and a replacement check was issued to the correct entity (i.e., Homeschool Legal Defense Fund).

Item 2. Our understanding is that the Commission is inquiring as to why Schedule E of WSO PAC's Amended 12 Day Pre-General Report did not reflect certain itemized independent expenditures that were previously reported on its 48-hour reports during the reporting period. These independent expenditures required slight modifications from what was initially reported on 48-hour reports and what was later reported on the 12 Day Pre-General report, and it is our understanding that this is what lead to some confusion regarding Schedule E itemizations on the Pre-General report. In the amended report filed on May 18, 2015, these modifications have now been identified in the memo text of the individual transaction with a reference made to what was originally reported.

Amended 12 Day Pre-Run-Off Report

Item 1. WSO PAC has identified the affected transactions on Schedule B supporting Line 21(b) of the report and modified the description for "consulting" in its amended report filed on May 18.

Items 2 and 3. Regarding the reimbursements to individuals for "Travel Expenses/Reimbursement" disclosed on Schedule B of the Amended Pre-Run-Off Report, the Committee has itemized where necessary reimbursements to individual staff in excess of \$500, if related payments to any one vendor aggregated in excess of \$200 for the calendar year.

Item 4. Our understanding is that the Commission is inquiring as to why Schedule E of WSO PAC's Amended 12 Day Pre-Run-Off Report did not reflect certain itemized independent expenditures that were previously reported on its 48-hour reports during the reporting period. First, the majority of the transactions identified on the nine pages that were attached to the RFAI do correctly appear as itemized transactions on Schedule E of the Amended 12 Day Pre-Run-Off Report, and after discussing this issue with you, our understanding is that no further action is needed. Second, certain other independent expenditures required slight modifications from what was initially reported on 48-hour reports and what was later reported on the 12 Day Pre-Run-Off Report, and it is our understanding that this is what lead to some confusion regarding Schedule E itemizations on the Pre-Run-Off report. In the amended report filed on May 18, 2015, these modifications have now been identified in the memo text of the individual transaction with a reference made to what was originally reported.

Item 6. A reference to the "General Election" was inadvertently used for some Schedule E transactions reported on the 12 Day Pre-Run-Off Report, rather than referencing the applicable run-off election to which the transactions related. WSO PAC amended the report on May 18, 2015, to remedy this issue.

Item 7. The referenced "Wheat Radio Ad-Montana Statewide Race" and "Wheat Tattoo Piece-Montana Statewide Race Mailer"

advertisements each pertained solely to a state candidate, rather than any federal candidates. It is our understanding that these disbursements were properly reported on Schedule B (under "other disbursements") rather than on Schedule E ("itemized independent expenditures").
